

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

MARICELA GARCIA

Plaintiff,

vs.

BALFOUR BEATTY
COMMUNITIES, LLC

Defendant.

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CIVIL ACTION NO. 3:21-CV-256-KC

DEFENDANT'S EXPERT WITNESS DESIGNATION

Defendant Balfour Beatty Communities, LLC designates the following expert witness:

Michael J. DePonte
JACKSON LEWIS P.C.
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Mr. DePonte may testify regarding Plaintiff's claims for attorneys' fees and costs, if necessary. He may be called to testify regarding attorneys' fees and costs, including whether the fees, costs and other expenses claimed are reasonable and necessary. His testimony will be based on the number of hours reasonably expended in this case, as well as his knowledge, experience, and familiarity with the rates charged in a case of this kind. He will also offer testimony as to the costs and expenses incurred in this case. Factors to be considered will be the usual and customary attorneys' fees and costs for cases of this type, the amount in controversy and results sought, the type and difficulty of legal questions involved, the time limitations imposed by the case, the benefits derived, the experience, reputation, and ability of the attorneys providing services, the time and labor required, and the skill required. Mr. DePonte's resume can be found at: <http://www.jacksonlewis.com/people/michael-j-deponte>.

Respectfully submitted,

/s/ Michael J. DePonte

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**ATTORNEYS FOR
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of this document was served upon the all attorneys of record as to all parties to the above case pursuant to the Federal Rules of Civil Procedure on April 25, 2022.

/s/ Michael J. DePonte

Michael J. DePonte